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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

ANGEL FRALEY; PAUL WANG; SUSAN	)	
MAINZER; JAMES H DUVAL, a minor, by and	)	Case No. CV 11-01726 LHK
through JAMES DUVAL, as Guardian ad Litem;	)	
and WILLIAM TAIT, a minor, by and through	)	<b>DECLARATION OF STEVEN R.</b>
RUSSELL TAIT, as Guardian ad Litem;	)	<b>WEINMANN IN SUPPORT OF</b>
individually and on behalf of all others similarly	)	<b>PLAINTIFFS' MOTION FOR</b>
situated;	)	<b>PROTECTIVE ORDER</b>
Plaintiff,	)	
	)	Hearing Date: February 21, 2012
vs.	)	Time: 10:00 a.m.
	)	Courtroom: 5
FACEBOOK, INC., a corporation and DOES 1 to	)	Judge: Hon. Paul S. Grewal
100, inclusive	)	Trial Date: December 3, 2012
	)	
Defendants.	)	
	)	
	)	

1 I, Steven R. Weinmann , hereby state and declare:

- 2 1. I am an attorney licensed to practice before all the courts of the State of California  
3 and I am admitted to practice before this Court. I am an attorney for Plaintiffs in this  
4 action. I have personal knowledge of the facts stated in this declaration, and if called  
5 upon to testify, could and would competently testify thereto. I make this Declaration  
6 in support of Plaintiffs' Motion for Protective Order.  
7
- 8 2. Plaintiffs filed the Complaint giving rise to this action on March 11, 2011. Plaintiffs  
9 subsequently filed their First Amended Complaint on 18, 2011. A Second Amended  
10 Complaint, which is presently the operative complaint in this case, was filed on June  
11 6, 2011.  
12
- 13 3. At the time the original Complaint was filed, in March 2011, the plaintiff class was  
14 represented by five named class representatives: Angel Fraley; Paul Wang; Susan  
15 Mainzer; James H Duval, a minor, by and through James Duval, as Guardian ad  
16 Litem; and William Tait, a minor, by and through Russell Tait, as Guardian ad  
17 Litem.  
18
- 19 4. Defendant has now taken the depositions of Susan Mainzer, James Duval, and  
20 William Tait. On February 7, 1012, our office received from Defendant a copy of  
21 the Notice of Deposition of Angel Fraley. The Notice anticipates the taking of Ms.  
22 Fraley's deposition in Seattle, Washington on February 14, 2012.  
23
- 24 5. To date, Defendants have neither deposed nor scheduled the deposition of Paul  
25 Wang. Mr. Wang has indicated to class counsel that he no longer wishes to serve as  
26 a named class representative.  
27

I declare under the penalty of perjury and under the laws of the State of California that the foregoing is true and correct, and that if called upon to testify, I could verify the accuracy of the same. This document was executed on February 13, 2012 in San Francisco, California.

Steven R. Weinmann